

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA  
**Plaintiff**

**v.**

2018 BUGATTI CHIRON (VIN#: VF9SP3V34JM795083),  
**Defendant *In Rem***

CIVIL NO.: 23-1392 (SCC)

**MOTION REQUESTING EXTENSION OF TIME**

TO THE HONORABLE COURT:

COMES NOW the United States of America, through the undersigned attorneys, and very respectfully states and prays as follows:

1. On October 5, 2023, counsel for Claimant filed a Motion to Dismiss the Complaint for Forfeiture *In Rem*. See ECF No. 24.
2. Given that Claimants can now review the contents of the unsworn declaration underlying the Verified Complaint, the United States request a short extension of 15 days to respond to the Motion to Dismiss in a manner that incorporates reference to the facts set forth in the unsworn declaration. This request is not meant to delay the matter unnecessarily.

[INTENTIONALLY BLANK]

*CIVIL NO.: 23-1392 (SCC)*

WHEREFORE, the United States respectfully requests this Honorable Court grant the extension of time herein requested.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21<sup>st</sup> day of November 2023.

W. STEPHEN MULDROW  
United States Attorney

/s/ Myriam Y. Fernández-González  
Myriam Y. Fernández-González  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 21<sup>st</sup> day of November 2023.

/s/ Myriam Y. Fernández-González  
Myriam Y. Fernández-González  
Assistant United States Attorney